

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF ARKANSAS, CENTRAL DIVISION**

FRAZIER, <i>et al.</i>)	
)	
Plaintiffs,)	
v.)	
)	
GRAVES, <i>et al.</i>)	Judge Kristine G. Baker
)	
Defendants.)	Case No. 4:20cv434
)	
)	
)	

MOTION FOR PROTECTIVE ORDER

COME NOW Plaintiffs, by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 26, move this Court for the issuance of a Protective Order providing for discovery of confidential records and other sensitive information only on specified terms and conditions, and restricting use and dissemination of such records or information secured through formal or informal discovery in this case. As grounds for their Motion, the Plaintiffs state to the Court as follows:

1. This is a civil lawsuit involving allegations that Defendants violated Plaintiffs' constitutional rights.
2. Plaintiffs anticipate the Parties will exchange information and take depositions concerning institutional records of the Defendants and possibly non-parties, and medical records.
3. Plaintiffs have already requested, and the Defendants have produced, in part, information and documents concerning institutional records of the Defendants and medical records
4. The production of these documents and tangible things, and the taking of depositions, have been impaired and hindered by the lack of a Protective Order controlling the use, dissemination, and disclosure of these materials and information.
5. Realizing that a Protective Order would be beneficial to the Parties and the discovery process, the Parties have, on multiple occasions, conferred with regard to an appropriate Protective Order

concerning these documents and information, but have been unable to reach an accord regarding the same. Plaintiffs' proposed Protective Order is attached hereto as Exhibit 1 and will be electronically submitted in Word format to the Court.

6. Pursuant to Federal Rule of Civil Procedure 26, this Court has the authority to issue the requested Protective Order.

WHEREFORE, based upon the above and foregoing, Plaintiffs move this Court to enter a Protective Order, in the form attached hereto, along with such other relief as this Court deems just and appropriate.

RESPECTFULLY SUBMITTED,

Dated: December 16, 2020

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Certificate of Service

I, Omavi Shukur, an attorney, hereby certify that on December 16, 2020, I caused to be served the foregoing on all counsel of record via electronic mail.

Omavi Shukur
One of Plaintiffs' Attorneys